



REEDER MCCREARY
— L L P —

February 7, 2024

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square Room 430
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Netburn:

We write Your Honor pursuant to your Individual Rule III. F to request that various designated documents being filed today in connection with Plaintiff's Opposition to Defendants' Motions for Summary Judgment be filed under seal. The documents solely reflect documents containing information from communications and other documents that Defendants have marked confidential. This is almost exclusively the same information that was redacted in the public record in Plaintiff's November summary judgment filings, and includes:

- 1) An unredacted version of Plaintiff's Opposition to the Prospect Defendants' motion for summary judgment addressing Freemans state law claims;
- 2) An unredacted version of Plaintiff's Opposition to the Defendants' motion for summary judgment addressing Freemans copyright claims; and
- 3) An unredacted version of Plaintiff's Response to Defendants' Rule 56.1 Statement of Undisputed Facts; and
- 4) Unredacted version of exhibits to Mark's declaration;

We thank the Court for its time and attention to this matter.

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Respectfully submitted,

Reeder McCreary, LLP

A handwritten signature in black ink, appearing to read 'Mark D. Passin', is positioned above a horizontal line.

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cc: All counsel of record (via ECF)